

EXHIBIT D

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By Email and First Class Mail

February 26, 2018

Sean P. Carter, Esquire
Scott Tarbutton, Esquire
Cozen O'Connor, P.C.
1650 Market Place
Philadelphia, PA 19103-7301

Re: *In re Terrorist Attacks*, No. 03-MDL-1570

Dear Counsel:

I write on behalf of the Defendants Dr. Abdullah Al-Turki, Dr. Abdullah Al-Obaid, Dr. Abdullah Naseef, and Dr. Adnan Basha, in response to your letter of February 6, 2018, which sought to schedule their depositions.

I am working on determining their specific availability. As a preliminary matter, I expect that all four deponents will require an Arabic translator; although several can read in English, they are much more fluent in Arabic. Also, as you know, it is unlikely that they will be able to be deposed during the month of Ramadan (May 16 – June 14).

Finally, one or more of these individuals will be unable to travel outside their home country due to medical issues. Since Judge Netburn's Deposition Protocol Order and her statements at the September 7, 2017 court hearing specifically contemplated taking depositions by video conferencing, this will substantially reduce plaintiffs' expenses, since you will be able to take the depositions from your office, without any travel involved.

Sincerely,

/s/ Alan

Alan R. Kabat

cc: MDL 1570 counsel